

# **At the Crossroads of Tax Co-operation: IFA (India) - OECD International Tax Conference**

**Mumbai, India, 23-25 January 2008**

## **Press Release**

25 January 2008 -- More than 250 participants met in Mumbai, India, on 23-25 January 2008 to discuss a broad range of international tax issues at the Conference "At the Crossroads of Tax Co-operation: IFA (India) – OECD" that was jointly organized by the Indian Branch of the International Fiscal Association (IFA) and the Organisation for Economic Co-operation and Development (OECD) to mark the accession of India as observer to the OECD Committee on Fiscal Affairs.

Participants in the conference included senior tax officials from India, representatives from India's judicial system, officials from the OECD Centre for Tax Policy and Administration, tax advisers, representatives of multinational enterprises and leading international tax academics from India and a number of countries.

The participants were welcomed by the conference Co-Chairmen, Mr. Porus Kaka (IFA India) and Mr. Jacques Sasseville (OECD).

The conference was inaugurated by the Honourable Swatanter Kumar, Chief Justice of the Bombay High Court, Honourable Justice P.V. Reddi, Chairman of the Indian Authority for Advance Rulings, Mr. R. Prasad, Chairman for India's Central Board of Direct Taxes, Mr. Marcus Desax, President of IFA, and Mr. T.P. Ostwal, President of the Indian IFA Branch.

The conference's various sessions dealt with the following topics:

- Evolution of the India-OECD tax co-operation
- The Indian tax treaty policy: comparing Indian tax treaties with the OECD and UN Models
- The tax treaty treatment of technical fees, royalties and services
- The conditions for service and agency permanent establishments
- Recent decisions and rulings relating to international tax
- Attribution of profits to permanent establishments: recent OECD work and Indian approach
- Transfer pricing: comparing the Indian approach with the OECD Transfer Pricing Guidelines
- The resolution of tax treaty disputes: recent OECD work and Indian practices
- Beneficial ownership: treaty entitlement including transparent entities
- The next steps: tax agenda of the OECD and the Indian Government

Through case studies, policy discussions, presentations of recent court decisions and analyses of applicable rules of domestic law and treaties, the panelists addressed a number of important international tax issues related primarily to tax treaties and transfer pricing.

The evolution of the co-operation between the OECD and India was a main theme discussed during the conference. OECD co-operation with India is fast developing, with the first ever OECD Economic Survey of India released on October 9, 2007. There were frequent references to the history of that co-operation in the tax area, its mutual benefits and its likely evolution in the context of the OECD enhanced engagement program. That program is offered to India and other major countries whose engagement in the work of the OECD is particularly important for the fulfilment of the Organisation's mandate to promote policy convergence and global economic development. As an observer, India is now able to participate directly and

actively in the work of the OECD Committee on Fiscal Affairs, which contributes to setting international tax standards, in particular in areas like tax treaties and transfer pricing.

The President of IFA, Mr. Desax, underlined the importance of IFA, which is the foremost international organisation in the tax area, comprising more than 11 500 tax officials, academics, business representatives and advisers from 102 countries. He noted that IFA India, which was organised in 1992, had already become the fifth largest branch and that representatives of the Indian branch not only sit on IFA's Executive and Permanent Scientific Committees but also participate regularly in panel discussions during IFA's annual international congresses. He looked forward to India hosting the 2014 annual congress and reminded participants of the success of the New Delhi 1997 Congress, which was the first IFA congress in South-Asia.

To find more about the conference, please visit [www.oecd-ifaindia-taxconference.com](http://www.oecd-ifaindia-taxconference.com)

To find out more about the OECD, please visit [www.oecd.org](http://www.oecd.org)

To find out more about IFA, please visit [www.ifa.nl](http://www.ifa.nl)

Journalists may also obtain further information from:

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